



U.S. Department of Justice

United States Attorney  
Eastern District of New York

RCH  
F. #2018R01309

271 Cadman Plaza East  
Brooklyn, New York 11201

July 16, 2021

By E-mail

The Honorable James R. Cho  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Rashid Sultan Rashid Al Malik Alshahhi, et al.  
Criminal Docket No. ( )  
**1:21-cr-00371(BMC)(TAM)**

Dear Judge Cho:

On July 16, 2021, an indictment was returned in the above-captioned matter and filed under seal, together with warrants for the arrests of the charged defendants. The indictment charges the defendants with acting as agents of a foreign government without prior notification to the Attorney General and conspiracy to act as agents of a foreign government without prior notification to the Attorney General. The indictment also charges Thomas Joseph Barrack with obstruction of justice and making material false statements. A copy of the sealed indictment is attached.

The government respectfully requests that the Court enter a partial unsealing order for the limited purpose of providing the indictment and related arrest warrants to United States government officials in connection with potential efforts to arrest and extradite the defendants and for other national security purposes. The government requests that the indictment and arrest warrants otherwise remain under seal and that this letter, which discusses the sealed indictment, be filed under seal until further order of this Court.

Respectfully submitted,

JACQUELYN M. KASULIS  
Acting United States Attorney

By: /s/  
Ryan C. Harris  
Assistant U.S. Attorney  
(718) 254-6489

Enclosure

cc: Clerk of Court (by Email)